PD-0745-18
COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS
Transmitted 11/28/2018 10:06 AM
Accepted 11/28/2018 4:11 PM
DEANA WILLIAMSON
CLERK

NO. PD-18-0745

IN THE COURT OF CRIMINAL APPEALS
OF THE STATE OF TEXAS

FILED
COURT OF CRIMINAL APPEALS
11/28/2018
DEANA WILLIAMSON, CLERK

JOSEPH ANDREW DIRUZZO,
Appellant,

v.

THE STATE OF TEXAS,
Appellee.

On Appeal from Cause Number 14-05-27939-A
In the 24th Judicial District Court of Victoria County and
Cause Number 13-16-00638-CR
In the Court of Appeals for the Thirteenth Judicial District of Texas.

BRIEF FOR THE STATE

STEPHEN BRET TYLER
Criminal District Attorney
Victoria County, Texas

BRENDAN WYATT GUY
Assistant Criminal District Attorney
Victoria County, Texas
205 N. Bridge St. Ste. 301,
Victoria, Texas 77901-6576
(361) 575-0468
(361) 570-1041 (fax)
bguy@vctx.org
State Bar No. 24034895
(On Appeal)

Attorneys for the State of Texas

ORAL ARGUMENT NOT REQUESTED

TABLE OF CONTENTS

PAGE (S)

INDEX OF AUTHORITIES

Federal District Court Cases

Texas Cases

Texas Statutes

Texas Rules

NO. PD-18-0745

IN THE COURT OF CRIMINAL APPEALS
OF THE STATE OF TEXAS

JOSEPH ANDREW DIRUZZO,……...……Appellant

v.

THE STATE OF TEXAS,……..…..……...Appellee

* * * * *

STATE'S BRIEF ON THE MERITS

* * * * *

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

Comes now the State of Texas, by and through its Criminal District Attorney for Victoria County, and respectfully presents to this Court its brief on the merits in the named cause.

ISSUES PRESENTED

I. Did Appellant fail to properly preserve at the trial court his claim of error under the *in pari materia* doctrine?

II. Were Appellant's due process and due course of law rights violated by being prosecuted under Section 165.152 rather than Section 165.153 of the Texas Occupation Code?

III. Is Section 165.152 applicable only to license holders?

STATEMENT OF THE FACTS

On May 2, 2014 Appellant was charged by indictment with sixteen counts of the Illegal Practice of Medicine in violation of Sections 155.001 and 165.152 of the Texas Occupation Code. [CR-I-9-14].

On April 28, 2016, Appellant filed a joint motion to quash the indictment. [CR-I-274]. This motion alleged that the indictment failed to allege a felony offense and as such that the trial court lacked subject matter jurisdiction over the case. [CR-I-275-279]. On May 17, 2016, the trial court denied Appellant's motion to quash the indictment. [CR-I-285].

On October 31, 2016, Appellant's case was called to trial. [RR-IV-1]. On November 2, 2016, the State completed the presentation of its case in chief and rested. [RR-VI-198]. Upon the State resting, Appellant did not seek any sort of directed verdict or urge any sort of *in pari materia* claim. [RR-VI-199]. Instead Appellant immediately began presenting the defense's case. [RR-VI-199].

Appellant did not assert any sort of *in pari materia* objection to the proceedings at any time from the point when the State rested to when the jury returned its verdict. [RR-VI-198-VII-202].

The jury found Appellant guilty on all sixteen counts as alleged in the indictment. [RR-VII-202-206].

On November 22, 2016, Appellant filed his notice of appeal. [CR-I-460-461].

On that same day Appellant also filed a motion for new trial and motion in arrest of judgment. [CR-I-463]. This motion did not urge any *in pari materia* claim. [CR-I-463-465].

On November 23, 2016, Appellant filed an amended motion for new trial and motion in arrest of judgment. [CR-I-469]. This amended motion did not urge any *in pari materia* claim. [CR-I-469-477].

On December 5, 2016, Appellant filed a second amended motion for new trial and motion in arrest of judgment. [CR-I-504]. This second amended motion did not urge any *in pari materia* claim. [CR-I-504-513].

On January 10, 2017, Appellant filed a third amended motion for new trial and motion in arrest of judgment. [CR-I-538]. This third amended motion did not urge any *in pari materia* claim. [CR-I-538-551].

On January 13, 2017, a hearing was held on Appellant's third amended motion for new trial and motion in arrest of judgment. [RR-IX-1]. At no time in this hearing did Appellant advance any argument that his prosecution was improper under any sort of *in pari materia* claim. [RR-IX]. The trial court denied Appellant's motion for new trial. [RR-IX-26; CR-I-552].

On appeal Appellant did argue that the prosecution against him was barred in accordance with the *in pari materia* doctrine. *Diruzzo v. State*, 549 S.W.3d 301, 305 (Tex. App.-Corpus Christi 2018, pet. granted.) Nevertheless, the Thirteenth Court of Appeals ruled against Appellant and affirmed his conviction on all counts. *Id.* at 314.

SUMMARY OF THE ARGUMENT

Appellant failed to properly preserve his claim of error under the *in pari materia* doctrine since Appellant's pre-trial motion to quash was premature, and Appellant failed to reurge his *in pari materia* objection at the conclusion of the State's case or in a motion for new trial. It is also immaterial that the State did not argue that Appellant procedurally defaulted on this claim at the appellate court level. The State was the prevailing party at both the trial court and the appellate court level and as such can raise a new argument for the first time at the Court of Criminal Appeals.

Nor were Appellant's due process or due course of law rights violated by being prosecuted under Section 165.152. While that statute may cover the same ground as Section 165.153, Section 165.152 is the more recent legislative enactment and was clearly intended by the legislature to supercede Section 165.153. Therefore Section 165.152 is the controlling

statute when it comes to prosecuting offenders for practicing medicine without a license.

There is also no basis to conclude that Section 165.152 applies only to license holders. Both the text and history of the statute make clear it was meant to apply to all individuals and applying Section 165.152 only to license holders would lead to absurd results. Thus to give full effect to the legislature's enactments, Section 165.152 should be read as applying to all individuals and should be recognized as the controlling statute governing the prosecution of practicing medicine without a license.

ARGUMENT

I. Appellant failed to properly preserve his Due Process and Due Course of Law claims under the *in pari materia* doctrine at the trial court and thus his petition should be dismissed as improvidently granted.

As a threshold matter, Appellant's petition was improvidently granted as Appellant failed to make the required timely objection at the trial court necessary to preserve a claim of a Due Process or Due Course of Law violation for review on appeal. Therefore Appellant's petition should be dismissed as improvidently granted.

A. Law on preserving a claim of error.

To preserve a claim of error on appeal the record must show that an appellant made a timely request, objection, or motion and that the trial court ruled on that request, objection or motion. *Garza v. State*, 126 S.W.3d 79, 81-82 (Tex. Crim. App. 2004); TEX. R. APP. P. 33.1(a). This preservation requirement applies for all but the most fundamental of rights and applies even when the alleged error is constitutional in nature. *Henson v. State,* 407 S.W.3d 764, 767 (Tex. Crim. App. 2013). Failure to make the required, timely objection waives most claims of error.

B. Appellant failed to make the required timely objection under the *in pari materia doctrine* and thus failed to preserve any claim of error under such a theory.

In this case Appellant did submit a pre-trial motion to quash where he essentially asserted that the charge against him was improper under the *in pari materia* doctrine. [CR-I-275-279]. However, since that objection was brought pre-trial it was premature. See *Ex parte Smith,* 185 S.W.3d 887, 893 (Tex. Crim. App. 2006)(holding that *in pari materia* claims that are raised pretrial are premature since the evidence at trial could conceivably show that it was appropriate to charge the defendant under the more general provision rather than the more specific provision.)

The proper procedure to preserve a claim of error under the *in pari materia* doctrine is for the objecting party to raise the *in pari materia* objection at the conclusion of the State's case as part of a motion for directed verdict or, failing that, to raise the *in pari materia* claim in a motion for new trial. *Azeez v. State*, 248 S.W.3d 182, 194 (Tex. Crim. App. 2008). Appellant did neither.

Once the State rested, Appellant neither requested a directed verdict nor made any kind of motion to reurge his pre-trial motion to quash. [RR-VI-198-199]. Nor did Appellant raise the *in pari materia* claim as part of his subsequent motions for a new trial. [CR-I-463-465, 469-477, 504-513, 538-551.] And Appellant also did not argue the *in pari materia* claim in the hearing that was held on his motion for new trial. [RR-IX].

Therefore Appellant failed to raise the *in pari materia* claim in a timely manner and because of that failure he waived any claim of error under the *in pari materia* doctrine and accordingly should be barred from presenting this claim on appeal.

C. The State can argue waiver for the first time at the Court of Criminal Appeals.

Nor does it matter that the State failed to argue in its brief at the Thirteenth Court of Appeals that Appellant procedurally defaulted his *in*

pari materia argument through lack of proper preservation in the trial court. The procedural default rules apply only to the losing party at the trial court level. See *McClintock v. State,* 444 S.W.3d 15, 20 (Tex. Crim. App. 2014). The prevailing party at the trial court level may raise a new argument for the first time on appeal even at the Court of Criminal Appeals. *Id.*

In this case the State was the prevailing party at both the trial court level (and again at the Thirteenth Court of Appeals). Therefore the State can raise Appellant's procedural default of his *in pari materia* claim for the first time on appeal, and since it is clear from the trial record that Appellant failed to properly preserve this particular claim, Appellant's petition should be struck as improvidently granted.

II. Appellant's due process and due course of law rights were not violated by being prosecuted under Section 165.152 of the Texas Occupations Code.

A. Law applicable to the *in pari materia* doctrine.

A defendant generally has a due process right to be prosecuted under the more specific statute when that statute is *in pari materia* with a more general statute and the two statutes irrevocably conflict. *Azeez,* 248 S.W.3d at 192. However, there is an exception to the *in pari materia* doctrine when the more general provision is the later enactment and was clearly intended to prevail over the more specific provision. *Azeez,* 248 S.W.3d at 192. In

those circumstances the general provision controls over the more specific provision and as such there is no due process violation in being prosecuted under the more general provision. *Azeez*, 248 S.W.3d at 192.

In this case Appellant contends that the statute he was prosecuted under (Section 165.152 of the Texas Occupations Code) is *in pari materia* with a more specific statute, Section 165.153 of the Texas Occupations Code. However, a review of the applicable statutes shows that Section 165.152 of the Texas Occupations Code is both the more recent legislative enactment and was clearly intended by the legislature to control over Section 165.153. Therefore Section 165.152 is the controlling statute and there was no due process or due course of law violation in Appellant being prosecuted under Section 165.152.

B. Section 165.152 was the controlling statute for prosecuting Appellant for practicing medicine without a license.

1. Section 165.152 is the more recent legislative enactment.

It is unquestionable that the current version of Section 165.152 of the Texas Occupations Code is a more recent legislative enactment than the most current version of Section 165.153. The current version of Section 165.152 (which makes the practice of medicine without a license a third degree felony) went into effect on June 10, 2003 while the most recent (and

indeed the only) version of Section 165.153 went into effect on September 1, 1999. Therefore the current version of Section 165.152 was enacted nearly four years after the most current version of Section 165.153.

2. The Texas legislature clearly intended Section 165.152 to control over Section 165.153

It is also unquestionable that the Texas legislature manifestly intended the current version of Section 165.152 to control over Section 165.153.

Section 165.152 and Section 165.153 both originally went into effect on September 1, 1999. At that time an offender who practiced medicine without a license but otherwise caused no harm was punished under Section 165.152 as a Class A misdemeanor; an offender who practiced medicine without a license and caused financial harm to another was punished as a state jail felony offender under Section 165.153(a)(2); and an offender who practiced medicine without a license and caused physical or psychological harm to another was punished as a third degree felony offender under Section 165.153(a)(1). Therefore the 1999 legislation plainly established a statutory framework where there were escalating levels of punishment based on the severity of harm inflicted by the offender, and under this framework Section 165.153 clearly served as a punishment enhancement provision for Section 165.152.

That Section 165.153 was meant as an enhancement provision for Section 165.152 was also made clear by the very title of Section 165.153, "Criminal Penalties for Additional Harm." Statutory titles can be used to help interpret the meaning of a statute. See *Baumgart v. State*, 512 S.W.3d 335, 339 (Tex. Crim. App. 2017). And in this case the title of Section 165.153 only makes sense if Section 165.153 was meant to serve as a punishment enhancement provision supplementing another statute (specifically Section 165.152), since it is imposing an additional penalty (beyond what Section 165.152 would allow) for offenders who cause "additional harm."

Thus it is clear that Sections 165.152 and 165.153 were originally meant to work in tandem. However, that changed in 2003 when the Texas legislature revised Section 165.152 so that henceforth violating the statute and practicing medicine without a license would be a third degree felony in all cases. TEX. OCC. CODE §165.152(c) (West 2012).

Logically, the only reason for the legislature to revise the punishment under Section 165.152 was that the legislature had decided to scrap the 1999 staggered punishment regimen altogether in favor of adopting an across the board punishment regimen for all cases. There is simply no other reason why the legislature would increase the punishment level for an offense under

Section 165.152 past the punishment levels authorized in Section 165.153 unless the legislature intended the revised version of Section 165.152 to supersede Section 165.153.

Nor does it matter that the legislature did not explicitly repeal Section 165.153 in 2003 as the legislature's actions served to implicitly repeal Section 165.153, and while the implied repeal of statutes is not favored, it can occur. See *Dodd v. State,* 650 S.W.2d 129, 130 (Tex. App.-Houston [14th Dist.] 1983, no writ.)

In this case the legislature's decision in 2003 to amend Section 165.152 so as to increase the punishment level for offenses committed under that statute to a level beyond those authorized by Section 165.153 clearly rendered Section 165.153 superfluous and thus obviously served to implicitly repeal that statute in favor of the revised version of Section 165.152.

Therefore based on the statutory history the legislature manifestly intended Section 165.152 to be the controlling statute in regards to prosecuting practicing medicine without a license, and as such there was no violation of Appellant's due process or due course of law rights in him being prosecuted under Section 165.152.

C. Section 165.152 does not apply only to license holders.

Appellant now tries to argue that the seeming conflict between Sections 165.152 and 165.153 can be resolved by interpreting Section 165.152 as to hold that it only applies to people who at one time had a medical license. Such an interpretation is entirely inconsistent with both the plain language and history of the stature and would plainly lead to absurd results, and thus such an interpretation should be rejected.

1. The statutory language of Section 165.162 does not support the idea that it is limited only to license holders.

The seminal rule of statutory construction is to presume the legislature meant what it said. *State v. Vasilas,* 187 S.W. 3d 486, 489 (Tex. Crim. App. 2006). Furthermore, when a statute's language is clear and unambiguous, the legislature must be understood to mean what it expressed, and reviewing courts are not to add or subtract from the statute. *Boykin v. State*, 818 S.W. 2d 782, 785 (Tex. Crim. App. 1991).

In this case the plain language of Section 165.152 clearly states that the statute applies to all individuals. The statute reads "a person commits an offense if" not "a license holder commits an offense if" or "a person commits an offense if, while holding a license," or any other wording that would limit the statute to only apply to license holders. See TEX. OCC. CODE §165.152(a) (West 2012)(emphasis added). Nor is there any

subsequent language in the statute or elsewhere in the Texas Occupations Code that requires the State to prove the offender was a license holder to be subject to prosecution under Section 165.152. Thus in the absence of any statutory language limiting the applicability of Section 165.162 to license holders it must be presumed the legislature meant what it said by the plain language of the statute which means the statute applies to all individuals not just to license holders.

Nor is it plausible that the statutory language was some kind of drafting error. The Texas legislature is clearly capable of drafting a statute in a way so as to clearly delineate that the statute only applies to license holders if that is what the legislature intends. This has been conclusively demonstrated through the enactment of statutes (primarily dealing with concealed handgun licenses) where the legislature expressly limited the applicability of the statute to license holders. See TEX. PENAL CODE §30.07(a) (West 2011)(prohibiting concealed handgun license holders from trespassing with a weapon); TEX. PENAL CODE ANN. §46.035(a) (West 2014)(prohibiting concealed handgun license holders from unlawfully carrying a weapon). As such if the legislature wanted Section 165.152 to apply only to license holders then they would certainly have put language in the statute stating that it only applied to license holders. The legislature did

not do so and thus it is clear they did not intend to limit Section 165.152 to only apply to licensed offenders.

2. The statutory history of Section 165.152 does not support the idea that it is limited only to license holders.

The history of Section 165.152 likewise makes it manifest that the statute applies to all individuals rather than just license holders.

As already discussed Section 165.152 first went into effect on September 1, 1999. Under that 1999 version of the statute, an offense under Section 165.152 was a Class A misdemeanor unless the offender had a previous conviction under the statute in which case the offense became a third degree felony. This is especially significant because subsection (d) of that same statute established that upon final conviction of the statute a person forfeited any license they had. Since a conviction under the 1999 version of Section 165.152 led to a mandatory license forfeiture, it would be all but impossible for a licensed offender to ever get a second conviction under that statute since they would forfeit their license upon the first conviction and thus the existence of the enhancement provision in the 1999 version of Section 165.152 makes it obvious that the statute was always meant to apply to all individuals and not just license holders.

Now admittedly the Thirteenth Court of Appeals did devise a scenario where a license holder could be twice prosecuted under this statute. However, that scenario required a defendant to have a license to practice medicine, have that license be suspended, proceed to practice medicine without a license, get convicted for practicing medicine without a license, forfeit their license as part of their conviction, somehow get their license to practice medicine reinstated, then get their license suspended yet again, practice medicine without a license yet again, and then get prosecuted for practicing medicine without a license yet again. See *Diruzzo*, 549 S.W.3d at 308. While such a tortured sequence of events is perhaps theoretically possible, it is such an exceedingly improbable fact pattern that it is impossible to believe that is what the legislature had in mind when they enacted Section 165.152(c) as compared to simply policing any individual (license holder or not) who twice practiced medicine without a license.

Thus it seems clear that the original version of Section 165.152 was meant to apply to all individuals, not just license holders, and nothing in the 2003 revision of the statute suggests that the legislature decided to subsequently narrow the focus of Section 165.152 so as to limit its application solely to licensed individuals. Thus if the statute was originally meant to apply to all individuals, and there have been no explicit change

made in the text of the statute (or discussed in the legislative history of the statute) when it was amended in 2003, then it must be concluded that the statute is still meant to apply to all individuals.

3. Limiting Section 165.152 to license holders would lead to absurd results.

It is also clear that Appellant's interpretation limiting Section 165.152 only to license holders would lead to absurd results.

The rationale for laws prohibiting practicing medicine without a license is to protect the public. Such laws were enacted after "public outrage over insipid and often harmful patent medicines and the ministrations of untrained healers became so widespread and the effects of their handiwork so egregious that the Federal and State governments were forced to act." *Garcia v. Texas State Bd. of Medical Examiners*, 384 F. Supp. 434, 437-438 (W. D. Tex. 1974). The public has a right to know that when they pay for medical treatment they are receiving valid medical treatment from qualified individuals and "rigid, licensing procedures and requirements" are the best way to insure "the quality and competence of the practitioner." *Id.* at 438.

Thus the entire purpose of these laws was meant to protect the public. And yet Appellant seeks an interpretation of Section 165.152, where

protecting the public is at best a secondary goal and instead enforcing the licensing regimen becomes the primary goal.

Notably, under Appellant's interpretation of Section 165.152, a license holder practicing medicine without a license would be subject to a third degree felony punishment even if their "treatment" did not cause any harm to any individual, while a non-license holder who practiced medicine without a license and inflicted actual financial harm on a person would only be subject to state jail felony punishment per Section 165.153(c) of the Texas Occupations Code. Thus under Appellant's interpretation of Section 165.152 a person practicing medicine without a license and actually inflicting harm on another person has done less harm (and is deserving of less punishment) than a license holder practicing medicine without a license even when they do not inflict any harm. That is a patently absurd result if the purpose of these statutes is to protect the public, and thus such a result cannot be what the legislature intended.

Thus since Appellant's interpretation of Section 165.152 (where it would apply only to license holders) is inconsistent with both the plain language of the statute and the statutory history, and since such an interpretation would obviously lead to absurd results, there is no justification

to adopt such an interpretation. Section 165.152 is plainly meant to apply to all individuals and thus that interpretation should stand.

4. Limiting Section 165.152 to license holders does not carry out the full legislative intent.

Appellant also contends that it is necessary to adopt his interpretation of Section 165.152 to carry out the full legislative intent and cites in support of this claim the fact that the legislature struck the recidivist provision from Section 165.152 when they amended the statute in 2003. The State does not understand Appellant's argument on this point.

Obviously the recidivist provision was struck from Section 165.152 because it was no longer necessary when the statute was revised up to a third degree felony. (There is obviously no point in a recidivist offender provision that makes the offense a third degree felony when the offense had already been made a third degree felony.) Furthermore, the suggestion that the legislature struck the recidivist language so as to prevent Section 165.152 from being *in pari materia* with Section 165.153 is laughable. If the legislature was that concerned about the two statutes overlapping and wanted to make Section 165.152 apply only to licensed individuals they would hardly do so by striking the recidivist enhancement; they would instead do the obvious thing and make it explicit in the text of Section

165.152 that it only applies to license holders. (Something the legislature pointed did not do in 2003.)

Appellant's proposed interpretation of Section 165.152 certainly does not "give effect to each word, phrase, and clause" used by the legislature. Appellant instead seeks to have Section 165.152 rewritten in a manner that ignores the plain language of the statute and creates an entirely new element for that offense. That is a clear abuse of the *in pari materia* doctrine for while conflicting statutes are to be harmonized whenever possible under that*in* doctrine, harmonization is not a license for courts to act as some kind of super-legislature and completely rewrite statutes in order to achieve that harmonization.

The Texas legislature made its intent clear in 2003 when they revised Section 165.152 so as to establish a uniform punishment regimen for all practicing medicine without a license cases. That is a rational policy decision on the legislature's part as a uniform punishment system for these offenses makes prosecution of the cases much easier (since prosecutors no longer have to prove harm to establish a felony offense.) A uniform (felony) punishment level will also hopefully serve as a stronger deterrent against such conduct since all offenders now know they will be facing felony charges if they practice medicine without a license. And making all such

offenses felony-level conduct also makes it more likely that police will investigate and prosecutors will prosecute such conduct since law enforcement agencies typically devote more attention and energy to prosecuting felony level conduct than misdemeanors. Thus to give full effect to the legislative intent, Appellant's interpretation of Section 165.152 must be rejected, and Section 165.152 should be recognized as the controlling statute for all prosecutions related to practicing medicine without a license in the State of Texas.

PRAYER

WHEREFORE, PREMISES CONSIDERED, the State prays that this Honorable Court strike Appellant's petition as improvidently granted or in the alternative affirm the judgment of the Court of Appeals.

Respectfully submitted,

STEPHEN B. TYLER
CRIMINAL DISTRICT ATTORNEY

/s/ Brendan W. Guy
Brendan W. Guy
Assistant Criminal District Attorney
SBN 24034895
205 North Bridge Street, Suite 301
Victoria, Texas 77902
Telephone: (361) 575-0468
Facsimile: (361) 576-4139
E-mail: bguy@vctx.org

ATTORNEYS FOR THE APPELLEE,
THE STATE OF TEXAS

CERTIFICATE OF COMPLIANCE

In compliance with Texas Rule of Appellate Procedure 9.4(i)(3), I, Brendan Wyatt Guy, Assistant Criminal District Attorney, Victoria County, Texas, certify that the number of words in Appellee's Brief submitted on November 28, 2018, excluding those matters listed in Rule 9.4(i)(3) is 4,314.

/s/ Brendan W. Guy
Brendan W. Guy
Assistant Criminal District Attorney
SBN 24034895
205 North Bridge Street, Suite 301
Victoria, Texas 77902
Telephone: (361) 575-0468
Facsimile: (361) 576-4139
E-mail: bguy@vctx.org

CERTIFICATE OF SERVICE

I, Brendan Wyatt Guy, Assistant Criminal District Attorney, Victoria County, Texas, certify that a copy of the foregoing brief was sent by United States mail to Rick Davis and Sean Kipp at 504 East 27th Street, Bryan, Texas 77803 and Steven Lafuente at 2695 Villa Creek Drive, Suite 155, Dallas, Texas, 75234, Attorneys for Appellant, Joseph Andrew Diruzzo, and by United States mail to Ms. Stacy M. Soule, P. O. Box 13046, Capitol Station, Austin, Texas 78711, State Prosecuting Attorney, on this the 28th day of November, 2018.

/s/ Brendan W. Guy

Brendan W. Guy
Assistant Criminal District Attorney
SBN 24034895
205 North Bridge Street, Suite 301
Victoria, Texas 77902
Telephone: (361) 575-0468
Facsimile: (361) 576-4139
E-mail: bguy@vctx.org